

# **EXHIBIT 3**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125-MEK

**PLAINTIFFS' THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS**

PROPOUNDING PARTY: PLAINTIFFS

RESPONDING PARTY: ALL DEFENDANTS

SET NUMBER: THIRD (3)

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs, individually and on behalf of all others similarly situated, request that Defendants (as these Requests are directed to each Defendant, “You” or “Your”) deliver the Documents described below to 99 Park Avenue, Suite 1910, New York, New York 10016, within thirty (30) days of service of these discovery requests, or otherwise make the Documents available to Plaintiffs’ counsel, in accordance with the Definitions and Instructions below. These Requests are continuing in nature, such that responsive Documents discovered subsequent to service of Your responses hereto shall be produced within thirty (30) days of discovery, pursuant to Rule 26(e) of the Federal Rules.

### **DEFINITIONS, INSTRUCTIONS, AND RELEVANT TIME PERIOD**

The Definitions, Instructions, and Relevant Time Period for this Third Set of Requests for Production of Documents to All Defendants are identical to those in Plaintiffs’ First Set of Requests for Production of Documents to All Defendants served on September 19, 2022, and Plaintiffs’ Second Set of Requests for Production of Documents to All Defendants served on November 7, 2022. To the extent You regard any of the following Requests as overlapping with any Requests in Plaintiffs’ First or Second Sets of Requests for Production, You should treat the following Requests as providing greater specificity as to certain of the documents requested.

#### **I. Documents Concerning the 568 Group and Consensus Methodology**

**RFP No. 1:** All Documents Concerning the 568 Group, including the purposes or reasons for the formation of the 568 Group in 1998, including Documents Concerning Your communications with third parties, with Your board of trustees, and with counsel other than Your counsel.

**RFP No. 2:** All Documents Concerning any reservations or concerns expressed by You, any 568 Group Member, or non-member institution regarding the purposes or operation of the 568 Group, including any concerns about collusion or violation of antitrust laws.

**RFP No. 3:** All Documents Concerning the purposes or reasons for the 568 Group's creation of the Consensus Methodology, including its principles.

**RFP No. 4:** All Documents provided to or considered by You in making any decisions to join, leave, purportedly withdraw from, or continue to participate in the 568 Group, including Documents provided to or considered by Your board of trustees.

**RFP No. 5:** All Documents provided to Your board of trustees or President Concerning the 568 Group, including any updates, status reports, progress reports, annual reports, or recommendations related to the 568 Group.

**RFP No. 6:** All Documents Concerning communications with any officer, trustee, or employee of Johns Hopkins, CalTech, or any non-member institution regarding any reasons for not joining the 568 Group.

**RFP No. 7:** All Documents Concerning any analysis, discussion, or communications by You, on Your behalf, or presented to You, regarding whether membership or participation in the 568 Group may constitute any actual or potential antitrust violation, including Documents Concerning Your communications with third parties and with counsel other than Your counsel. To the extent that such Documents reflect communications with other Defendants, this Request seeks Documents prior to the formation of any joint defense group after the filing of this Action.

**RFP No. 8:** All Documents Concerning the expiration of the 568 Exemption on September 30, 2022, including any conversations, meetings, or communications regarding the effect of the expiration of the 568 Exemption on Your participation in the 568 Group, including Documents Concerning Your communications with third parties, such as any person or entity employed as a lobbyist, and with counsel other than Your counsel.

**RFP No. 9:** All Documents Concerning the dissolution of the 568 Group on November 4, 2022, including any conversations, meetings, or communications regarding the decision to dissolve the 568 Group, including Documents Concerning Your communications with third parties and with counsel other than Your counsel.

**RFP No. 10:** All Documents Concerning any changes You or any other Defendant have made to any Admissions or Financial Aid policies or practices since the Complaint was filed.

## **II. Documents Concerning Donor Data**

**RFP No. 11:** All Documents in your President's office, Development Office, or Admissions Office Concerning any actual or potential Donation to You by the individuals in Appendix 1, as well as all Documents in your President's office, Development Office, or Admissions Office Concerning any Applicants who are identified in any files, records, databases, or software used by your Development Office as children or relatives of the individuals in Appendix 1.

**RFP No. 12:** Documents sufficient to show all Donations cumulatively valued at \$50,000 or more made by any Donor during the five years prior to the filing of this Action, including where no Student or Applicant name is identified in connection with such Donations.

## **III. Documents Specifically Pertaining to Each of the Defendants**

**RFP No. 13:** Documents sufficient to show whether any foreign national Applicants who are also Donor-related Admitted Applicants were admitted for permanent residence in the United States at the time of their applications to You, including those Applicants identified in Clara Molot, *From Russia With Money, Yale for Sale*, AIR MAIL (Mar. 26, 2022), <https://airmail.news/issues/2022-3-26/yale-for-sale>.

**CLARIFICATION CONCERNING PLAINTIFFS' FIRST AND SECOND SETS OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO ALL DEFENDANTS**

Plaintiffs provide the following clarification for their First Set of Requests for Production of Documents Nos. 68, 69, 72, 76, 79, 129, 130 and their Second Set of Requests for Production of Documents No. 3: To the extent those Requests use the words “analyzing,” “discussing,” “referring to,” and/or “reflecting,” You should treat those words as having the same meaning as the term “Concerning” as set forth in the Definitions section in Plaintiffs’ First Set of Requests for Production of Documents to All Defendants.

Dated: January 26, 2023

/s/ Robert D. Gilbert

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**APPENDIX 1**

<b>Parent Name(s)</b>	<b>Child(ren)'s Class Year(s)</b>	<b>Defendant University</b>
Estelle Choe and Paul Kim	2022, 2025	Columbia University
Robyn Field and Anthony O'Carroll	2021, 2023	Columbia University
Raymond and Amy Yu	2021, 2023, 2025	Columbia University
Elizabeth Albert and Howard M. Kleinman	2018, 2022	Columbia University
Rula and Omar Asali	2018, 2022	Columbia University
Edward D. Baker III	2020	Columbia University
Samara Bernot and Adam R. Meshel	2018, 2023	Columbia University
Shari and Gary Brooks	2024	Columbia University
Lynn and Charles Zhang	2017, 2020	Columbia University
Christian and Jennifer Dahlberg	2023	Columbia University
Carla De Landri and Florindo Volpacchio	2020	Columbia University
Jodie and Andrew Fink	2024	Columbia University
Jeffrey Fuisz and Alexandra Diamond	2026	Columbia University
Bradley and Michelle Goldberg	2025	Columbia University
Eric and Tamar Goldstein	2015, 2018, 2025	Columbia University
Kimberley Hatchett and Tracy Maitland	2024	Columbia University
Melonee and Russell Horowitz	2026	Columbia University
Maral and Sarkis Jebejian	2026	Columbia University
Michael and Michelle Kaiser	2020, 2025	Columbia University
Robyn Kampf and John Vincenti	2026	Columbia University
Kristine Kennedy	2024, 2026	Columbia University
Borah and Sang Kim	2025, 2026	Columbia University
Robin-Hwajin Kim	2023	Columbia University
Sungwan Kim and Hosun Yoon	2023	Columbia University
Joshua Kraft	2022	Columbia University
Patricia Labrada and Michael Camacho	2023	Columbia University
Grace and Nicholas Leone	2019, 2022, 2024	Columbia University
Ann and Francis Nexzypor	2008	Columbia University
Jenny and Tai H. Park	2025	Columbia University
Echo Ren and Jack Wang	2024	Columbia University
Shyanne and Kurt Roeloffs	2025	Columbia University
Jaye and John Rogovin	2023, 2025	Columbia University
Corinne and Robert Rooney	2023	Columbia University
Barbara and Michael Satow	2016, 2026	Columbia University

Valerie and Theodore Schweitzer	2024	Columbia University
Jill and Mark Shinderman	2025	Columbia University
Catherine and Thomas Strong	2024	Columbia University
Thomas and Mila Tuttle	2026	Columbia University
Manmeet and Harjeet Virdi	2024	Columbia University
Sandy Wang and Christopher McGowan	2024	Columbia University
Deborah and Jacob Wohlstadter	2025	Columbia University
Sherri and Douglas Wolf	2021, 2024	Columbia University
Beth and Scott Yagoda	2020, 2025	Columbia University
Lisa and John Ying	2023	Columbia University
Mark Wilf	2017	Vanderbilt University
Byron and Tina Trott	2014, 2017	Vanderbilt University
Mike Krzyzewski	2022	Duke University
Bruce Evans	2014, 2015, 2017	Vanderbilt University
Prakash and Anjali Melwani	2014	Duke University
Jon and Mindy Gray	2023	Yale University
Peter and Stephanie Nolan	2016, 2018, 2020	Cornell University
Kimberly Querry	2022, 2023	Northwestern University
Patrick and Shirley Ryan	2005	University of Notre Dame
Meridee Moore and Kevin King	2012	Columbia University
Arthur and Sandra Irving	2010	Dartmouth University
Anthony and Christie De Nicola	2012, 2017	University of Notre Dame
Len Blavatnik	2024	Yale University
Bruce and Martha Karsh	2014	Brown University
William and Amik Kuan Danoff	2023	Brown University
Mimi and Loren Reisner	2017, 2020	Brown University
Robin and Peter Roberts	2020	Brown University
Suya and Karim Basta	2018	Brown University
Donna Lloyd George	2016, 2024	Brown University
Dominique Bravo and Eric Sloan	2023	Brown University
Lauren O. Rosenkranz	2015, 2023	Brown University
Louis and Kimberly D'Ambrosio	2022	Brown University
Pamela and Laurence Baer	2022	Brown University
Mark and Megan Dowley	2021, 2022	Brown University
Teresa and E.A. Kratzman	2016, 2020	Brown University
Paula and Eric Madoff	2022	Brown University
Ashley and Jeffrey McDermott	2018, 2020, 2022	Brown University
Alison and Joseph Miller	2019, 2022	Brown University
Robert and Alicia Longobardo Wyckoff	2022	Brown University
Reva and Eric Fischman	2019, 2022	Brown University
Elizabeth and John K. Irving	2016, 2021	Brown University
Barbara and Duncan Chapman	2018, 2020	Brown University
Donna and S. Lawrence Davis	2018, 2020	Brown University

Margarita and Thomas Frongillo	2020	Brown University
Lois and Stewart Gross	2020	Brown University
Laura and Marc Klein	2020	Brown University
Joel A and Samantha Cohen	2026	Brown University
Jon D. and Emma Pliner	2026	Brown University
Pamela and Eric Stang	2025, 2026	Brown University
Bryn and John Vissicchio	2026	Brown University
Tracey and Todd Walters	2026	Brown University
Anne Marie Burgoyne and Brad Roberts	2025	Brown University
Dean and Elizabeth Durling	2025	Brown University
Eric T. Fry	2025	Brown University
Rachel S. Lam	2025	Brown University
Stephanie and Arthur Yopung	2025	Brown University
Julie and John Danaher	2024	Brown University
Andrea and Brady Enright	2024	Brown University
Chris and Deborah Heine	2023	Brown University
Carol and Brad Asness	2021	University of Chicago
Jeffrey and Suzanne Citron	2020, 2023	Duke University
Brian and Brandee Krzanich	2024	Duke University
Richard and Sarah Barton	2024	Duke University
Eryn Ament Bingle	2024	Duke University
Jeffrey Huber and Angel Vossough	2024, 2026	Duke University
Gordon Sondland and Katy Durant	2020, 2021	Duke University
Michael Salvino	2020	Duke University
Yvette Ostolaza	2022	Georgetown University
Peter and Susan Cooper	2002, 2002, 2007, 2010	Georgetown University
Suzanne and David Booth	2012	Georgetown University
Patrick and Shirley Ryan	2005	University of Notre Dame
Joel and Shari Ronkin	2023, 2025	University of Pennsylvania
Jane Ahn and Carl Park	2024, 2025	University of Pennsylvania
Barry and Andrea Cayton	2018, 2025	University of Pennsylvania
Cameron and Tracy Falconer	2025	University of Pennsylvania
Mitchell and Teri Gevinson	2019, 2023	University of Pennsylvania
Alex and Rebecca Ginzburg	2023, 2025	University of Pennsylvania
Bari and Neil Goldmacher	2025	University of Pennsylvania
Jason and Diana Harrison	2024	University of Pennsylvania
Randall and Lori Isenberg	2023	University of Pennsylvania
Marshall and Joanna Kiev	2024	University of Pennsylvania
Alan and Ada Kumar	2025	University of Pennsylvania
Elie and Jody Levine	2025	University of Pennsylvania
Andrew and Rebecca Stein	2025	University of Pennsylvania

Lisa Walker and William Rudnick	2025	University of Pennsylvania
Bill Wolf and Meredith Bluhm-Wolf	2024	University of Pennsylvania
John and Rachel Young	2020, 2022, 2024	University of Pennsylvania
Bruce and Marsha Karsh	2010	University of Pennsylvania
Mark Wilf	2017, 2024	Vanderbilt University
James and Rebecca Craig	2013	Vanderbilt University
Richard DeMartini and Jennifer Brorsen	2015	Vanderbilt University
Jay and Michaela Hoag	2015	Vanderbilt University
R. Scott and Courtney Pastrick	2009, 2010, 2014	Vanderbilt University
Brian and Mary Rogers	2008, 2010	Vanderbilt University
Edwin and Maureen Schloss	2013	Vanderbilt University
D. Michael and Claire Van Konyenburg	2015, 2016	Vanderbilt University
Jon and Abby Winkelreid	2012, 2015	Vanderbilt University
Lee and Ramona Bass	2010	Vanderbilt University
Scott and Kathleen Kapnick	2012	Vanderbilt University
David E. Shaw	2018, 2021, 2026	Yale University
Jon and Mindy Gray	2020	Yale University